

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**SUSAN DECUYPER,**

**Plaintiff,**

**v.**

**AMY CORS FLINN, ROBERT DAVID  
NEBEL, and JOY POLLOCK NEBEL,**

**Defendants.**

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**Case No.: 3:13-cv-00850**

**DEFENDANTS' REPLY IN SUPPORT OF MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT**

In response to the Defendants' first requests for an extension to respond to the plaintiff's lengthy and complex complaint, and acknowledging the parties' agreed two week extension, the Defendants have requested until October 21, 2013 to respond to the complaint. The plaintiff has objected, reasoning that this case needs to move quickly to resolution, but she has generously agreed to extend the deadline by six fewer days than the Defendants requested.

However, in the next breath, the plaintiff requests that the initial case management conference currently scheduled for October 21, 2013, be rescheduled. No clear reason for this rescheduling has been provided, and the request clearly is inconsistent with the plaintiff's stated desire for speedy prosecution. Further, the plaintiff has requested that this Court only allow defendants to file an Answer so as to not unduly delay the resolution of the matter. The plaintiff suggests no authority for limiting or otherwise precluding the defendants from filing whatever responsive pleading is merited by the plaintiff's complaint. Defendants respectfully submit that they should be entitled and allowed to respond as the allegations in the complaint merit.

Nevertheless, the defendants will agree to modify their request for an extension and seek only through Friday, October 18, 2013 to file their responsive pleading if the plaintiff will agree to keep the case management conference currently scheduled on Monday, October 21, 2013.

/s/ Neil M. McIntire  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this the 11<sup>th</sup> day of October 2013 a true and correct copy of the foregoing has been forwarded via the court's electronic filing system to:

**Scott Johannessen, Esq.**  
**LAW OFFICES OF SCOTT D. JOHANNESSEN**  
3200 West End Avenue, Suite 500  
Nashville, TN 37203

/s/ Neil McIntire